



285913

April 29, 1981

Mr. Thomas E. Cavanaugh, Jr., Manager
Residual Management Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

SUBJECT: APPLICATION FOR PROCESS ALLIANCE
PARTNERSHIP (PAP) DEVELOPMENT PERMIT:
D.E.MATSCHKE COMPANY FILE NO. 1042.001

Dear Mr. Cavanaugh:

This letter submittal is being sent in response to your letter and special conditions dated "Effective date March 30, 1981" in which an IEPA experimental developmental and operation permit was issued to PAP with expiration after October 1, 1981. This submittal is intended to bring your office up to date with respect to PAP current and prospective future operations and to serve as an application for a developmental permit per the instructions contained in special condition 8A, Page 2 of your March 30, 1981 letter.

Current operations at PAP involve the processing of Northern Petrochemical Company's (NPC's) spent caustic aqueous scrubbing solution and spent pickle liquors and spent etchants from Byproducts Management, Inc. Processing of NPC spent scrubber solution at PAP is destined to be reduced significantly if not eliminated altogether should the in-house Zimpro process, that NPC currently has in start-up, perform as planned. These changes at PAP could take place in the next few weeks or could drag on for months should serious Zimpro start-up problems develop. PAP's objective is to have their facilities available and properly permitted for NPC spent scrubber processing under all circumstances so that NPC continues to have a viable process alternative. Throughout this period of likely reduced NPC scrubber flows, PAP will continue to use the PAP-Joliet process for spent pickle liquors and etchants with the already prescribed, optional use of by-product lime, as needed, for neutralization followed by the conventional PAP pressure-filter dewatering.

Prospective and additional future operations at PAP will include the management of other industrial sludges and aqueous waste streams. PAP will be making separate application for supplemental permits for these activities within the near future with IEPA.

The following section of this letter pertains to PAP application for an IEPA developmental permit for the PAP-Joliet site. Earlier transmittals directed to the IEPA dated October 10, 1980; February 3, 1981; and February 28, 1981 and pertaining to developmental site permit application are hereby incorporated by reference and made part of this application for development site permit. The information contained in these earlier

Mr. Thomas E. Cavanaugh, Jr. 4/29/81 DEM Page 2

submittals was qualified as to existing or planned development of the PAP site. The planned development of the PAP site is now complete and is consistent with the statements of planned development contained in the earlier submittals. The responses that follow are organized to specifically address the new standard and special conditions cited in the March 30, 1981 letter allowing the current six-month experimental permit.

Standard Conditions

PAP acknowledges and agrees to abide by the statement entitled "Standard Conditions for Construction/Development Permits issued by the Illinois Environmental Protection Agency" and dated July 1, 1979.

Special Conditions

Spec. Cond.1 - The PAP Joliet facility will be developed and operated in accordance with chapters 2,3,7 and 9 of the IPCB Rules and Regulations.

Spec. Cond.2 - The PAP Joliet facility is developed and is operated so that no liquid wastes can flow from the property. Insofar as stormwater is concerned, please refer to Special Comment a on page 2 of PAP's February 3, 1981 transmittal to IEPA.

Generally speaking, neither liquid wastes nor stormwater can flow to the Corps of Engineers (COE) property from PAP Joliet inasmuch as the COE property is topographically higher. PAP is aware of only one occasion when COE claimed runoff to their property from PAP. This occasion might coincide with the report of which the IEPA is obviously aware. This writer personally inspected the area and subsequently dispatched operators to remove the liquid. In this instance, the only instance of which PAP is aware, the event occurred subsequent to a precipitation-melt sequence; consisted of one to two gallons in quantity in a depression in the soil at the COE fence in proximity to the PAP elevated diesel-fuel storage tank; and appeared to be, and was reported to be after soaking up with absorbent material, water from snow or ice melt and without odor. The only PAP source of runoff in that area was the diesel-fuel storage tank. That tank has been relocated, for other reasons, to another side of the PAP property. In any event, PAP is convinced that the one or two gallons of stormwater that was removed in this instance was not contaminated.

On one occasion in late December, 1980 or early January, 1981, a packing gland developed a major leak on a tank trailer used for temporary storage of NPC spent scrubber solution. While this tank trailer was in some proximity to COE property it is not believed that this leakage found its way to COE property. The spillage was discovered on PAP property the morning after the leak began. The spilled material was promptly recovered and removed by means of a vacuum truck and by excavation of affected surface gravel. These circumstances can no longer occur inasmuch as tank trailers are not now used as temporary storage for NPC scrubber solution nor are there any trailer or other facilities in proximity to COE property.

Mr. Thomas E. Cavanaugh, Jr. 4/29/81 DEM Page 3

Spec. Cond. 3 - Beginning the week of April 27, 1980 the following procedure is used for PAP filter-cake management:

- 1) Filter cake from between three to four filter press cavities is dropped and immediately loaded into a hopper end-loader and covered. The unopened filter press cavities remain closed.
- 2) Filter cake is transferred via the covered end-loader to a custom constructed and covered, sealed dumpster-box. The cover from the dumpster box is only removed long enough to add the load from the end-loader and then recovered.
- 3) Filter cake removal then continues through Steps 1) and 2) above until all of the nineteen filter press cavities have been opened and cleaned.
- 4) Filter press is closed and ready to begin new cycle.
- 5) Dumpster box, when full, is removed and the contents deposited at an IEPA permitted sanitary landfill.

In addition, PAP has ordered a specially designed, self-dumping hopper with an integral cover that can be fitted to the PAP end-loader. This hopper will give PAP the additional capability of receiving the dropped cake from three to four filter-press cavities thus eliminating the need for manual transfer of filter cake to the hopper. The new hopper will also be liquid tight and covered as is the current PAP end-loader hopper. Anticipated delivery for the new hopper is approximately two weeks from the date of this transmittal.

The above procedures are in compliance with the specifications requested in Special Condition 3. Prior to April 27, 1981 the entire filter-cake contents of the filter press was discharged and the press closed prior to transport of cake to the covered dumpster receptacle. The end-loader hopper was also not covered.

Spec. Cond. 4 - PAP is currently working within the restriction of 210,000 gallons per week of special waste. However the prospective future PAP business that will be the subject of future supplemental permit applications will likely necessitate significant increases in this limit.

Spec. Cond. 5 - The total storage capacity at PAP-Joliet is exactly as shown on PAP's plan sheet that has previously been filed with IEPA. In the Feb. 3, 1981, page 3 reference to "100,000 gallon additional free storage capacity" this writer was attempting to indicate that the efficiency of the new PAP permanent facilities no longer required the active use of all of the PAP installed storage, thus freeing this storage for other advantageous purposes. In summary, PAP has not installed any non-designated or non-permitted storage and this writer apologizes for the loose wording that was so subject to misinterpretation.

Exhibit 1, 2, 3, 4, 5, 6, 7, 8, 9
Page 9

Mr. Thomas E. Cavanaugh, Jr. 4/29/81 DEM Page 4

Spec. Cond. 6 - PAP concurs.

Spec. Cond. 7 - PAP concurs.

Spec. Cond. 8 - PAP concurs. A full size plan sheet showing up-to-date facilities including facilities for filter-cake management is included as Exhibit 1 of this transmittal. The current, up-to-date plan and procedure for handling filter cake in an acceptable manner are included in PAP's response to Special Condition 3 in this transmittal.

Spec. Cond. 9 - PAP concurs.

Spec. Cond. 10- PAP concurs. Manifesting applications to IEPA for spent etchants and pickle liquors are underway. Prior to this time and currently etchants and pickle liquors were handled as commodities with record keeping by means of bills of lading. NPC spent scrubbing solutions have always been IEPA manifested.

Spec. Cond. 11 - PAP concurs. PAP has informed By-Products Management, Inc., the customer for NPC recovered float oil, that IEPA manifesting procedures and applications must be undertaken. PAP has been informed that such applications are underway. Filter cake management by PAP has always been IEPA manifested.

Spec. Cond. 12 - PAP concurs.

Spec. Cond. 13 - PAP concurs.

Spec. Cond. 14 - PAP concurs.

Spec. Cond. 15 - PAP concurs.

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Please let me hear from you if there are any further questions or comments. Speaking for myself and PAP, I believe that such problems as evidenced by the above special conditions can be discussed and resolved by prior communication and without resort to the legal process.

Sincerely,

Donald E. Matschke, PhD, PE
President

D.E.MATSCHKE COMPANY

Partner,
PROCESS ALLIANCE PARTNERSHIP

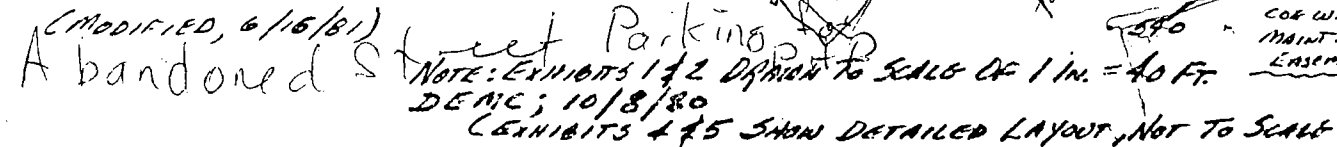
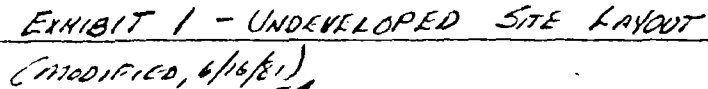
DEM:em, w/1 Exhibit

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2 SALT CREEK LANE
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312-654-1970

PROCESS ALLIANCE PARTNERSHIP
608 RAILROAD STREET
JOLIET, ILLINOIS 60436
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Alfred M. Tenny, President
BY PRODUCTS MANAGEMENT, INC.

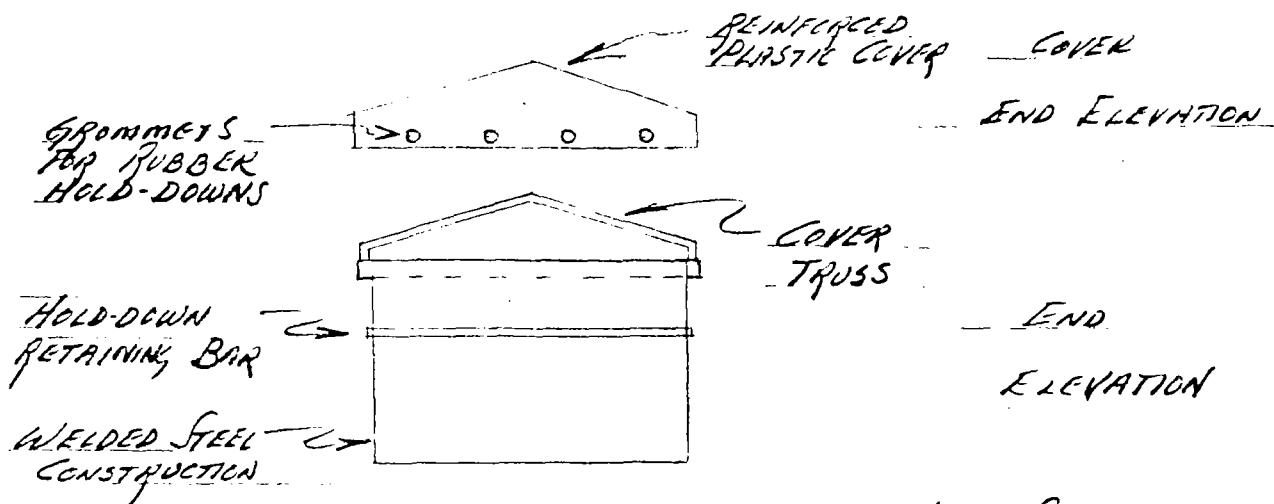
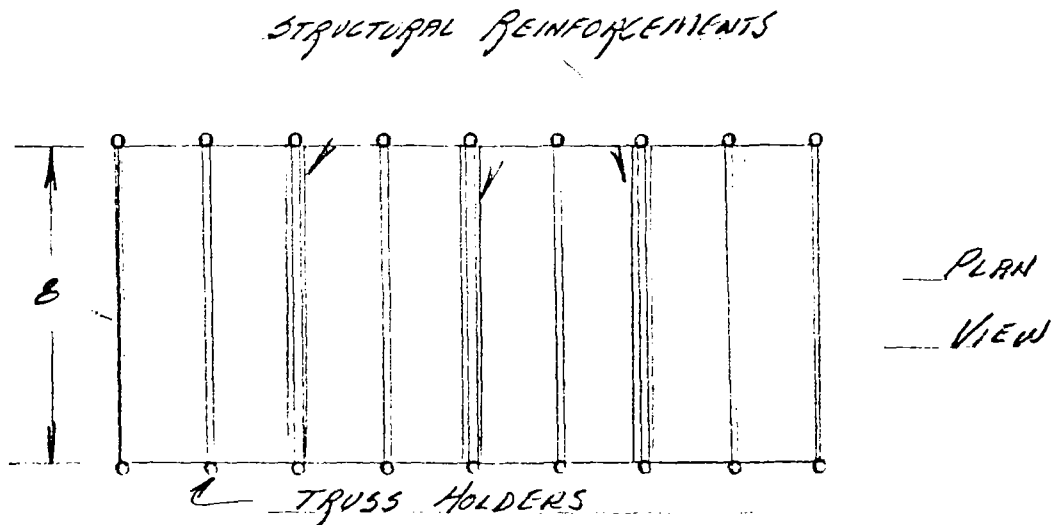
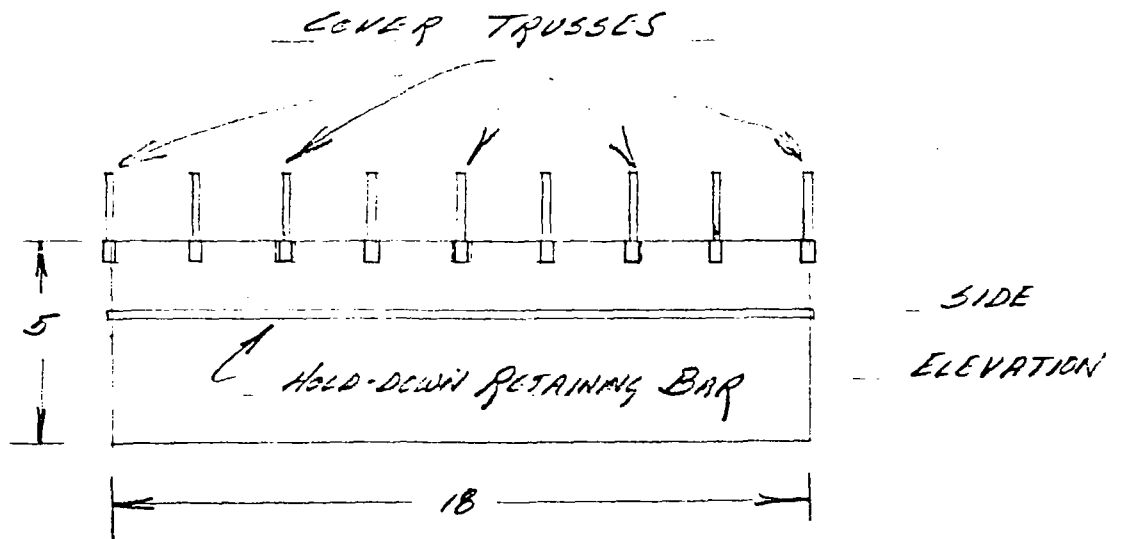
26



(MODIFIED 6/14/01) NOTE 1: PROTECTIVE CLAY BERM IS 1:1 SLOPE, STONE RID-RAP, 3' FOOT HIGH AT EAST END, 1 1/2 FOOT HIGH AT WEST END.
NOTE 2: PROPERTY IMMEDIATELY SOUTH OF RAP-TOLLIST IS UNUSED DEDICATED TOLLIST STREET ROW. COVE PROPERTY BEGINS APPROXIMATELY 80 FEET SOUTH OF RAP SOUTH PROPERTY LINE.

SCALE OF 1 INCH = 40 FEET; DEMIC, 4/28/81

EXHIBIT 4 PAP CUSTOM DUMPSTER BOX



NOT TO SCALE;
DEMIL; 1042.001; 6/16/81